

Report: CZR0026

21ST JUDICIAL CIRCUIT  
ST LOUIS COUNTY  
CIRCUIT COURT DOCKET SHEETDate: 04-Feb-2011  
Time: 9:01:53AM  
Page: 111SL-CC00136      **LATAUSHA DEBOISE V SPECIAL SCHOOL DISTRICT**      **Security Level: 1 Public**

<b>Case Type:</b>	CC Employmnt Discrmntn 213.111	<b>Case Filing Date:</b>	12-Jan-2011
<b>Status:</b>	Pet Filed in Circuit Ct		
<b>Disposition:</b>		<b>Disposition Date:</b>	

		<u>Release/Status</u>	<u>Reason</u>
		<u>Change Date</u>	
Judge	CAROLYN C WHITTINGTON (29542)		
Plaintiff Acting Pro Se	LATAUSHA DEBOISE (DEBL*4251)		
Defendant	SPECIAL SCHOOL DISTRICT (SPECIALSC)		

<u>Filing Date</u>	<u>Description</u>	
12-Jan-2011	<b>Judge Assigned</b> DIV 7	SHINELTM
	<b>Filing:</b> FILING INFORMATION SHEET	GALLOJAD
	<b>Pet Filed in Circuit Ct</b>	SHINELTM
18-Jan-2011	<b>Summons Issued-Circuit</b> Document ID: 11-SMCC-767, for SPECIAL SCHOOL DISTRICT. - HAND DELIVERED TO ST LOUIS COUNTY SHERIFF <b>Service/Attempt Date:</b> 21-Jan-2011	GALLOJAD
26-Jan-2011	<b>Summons Personally Served</b> Document ID - 11-SMCC-767; Served To - SPECIAL SCHOOL DISTRICT; Server - PIERSON, PATRICIA; Served Date - 24-JAN-11; Served Time - 00:00:00; Service Type - Territory 21; Reason Description - Served; Service Text - LEFT COPY	THOMPSME



Rita Boughan  
Sec to Super

26-261

## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

1-24-11

Judge or Division: <u>455</u> CAROLYN C WHITTINGTON	Case Number: 11SL-CC00136	St. Louis County Sheriff's Office JAN 19 AM 9:45 (Date File Stamp)
Plaintiff/Petitioner: LATAUSHA DEBOISE	Plaintiff's/Petitioner's Attorney/Address LATAUSHA DEBOISE 6244 JULIAN AVE SAINT LOUIS, MO 63133	
Defendant/Respondent: SPECIAL SCHOOL DISTRICT	Court Address: ST LOUIS COUNTY COURT BUILDING 7900 CARONDELET AVE CLAYTON, MO 63105	
Nature of Suit: CC Employmnt Discrmntn 213.111		

## Summons in Civil Case

The State of Missouri to: SPECIAL SCHOOL DISTRICT

Alias:

12110 CLAYTON ROAD  
SAINT LOUIS, MO 63131

JAN 20 2011

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

18-JAN-2011

Date

Further Information:  
JDG

*Joan P. Delaney*  
Clerk

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Rita Boughan (name) Secretary to Superintendent (title).

☐ other

Served at 12110 Clayton Rd 63131 (address)

in St. Louis (County/City of St. Louis), MO, on 1-24-11 (date) at 4:55 PM (time).

Patricia Pierson  
Printed Name of Sheriff or Server

Patricia Pierson  
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Sheriff's Deputy Salary  
 Supplemental Surcharge \$ 10.00  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: CAROLYN C WHITTINGTON	Case Number: 11SL-CC00136
Plaintiff/Petitioner: LATAUSHA DEBOISE	Plaintiff's/Petitioner's Attorney/Address LATAUSHA DEBOISE 6244 JULIAN AVE SAINT LOUIS, MO 63133
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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

UNITED STATES DISTRICT COURT  
Circuit Court of St. Louis County  
DIVISION

Latabusha DeBoise (Pro Se)  
NAME OF THE PLAINTIFF

- vs -

Special School District  
12110 Clayton Road  
St. Louis MO 63131

NAME OF THE DEFENDANT OR  
DEFENDANTS (Enter above the full name(s) of  
ALL defendant(s) in this lawsuit. Please  
attach additional sheets if necessary.

Case No.

JURY TRIAL DEMANDED

YES 7 NO    

**EMPLOYMENT DISCRIMINATION COMPLAINT**

1. This employment discrimination lawsuit is based on (check only those that apply):

☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.  
**NOTE:** In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.

☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).  
**NOTE:** In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.

☐ American with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.  
**NOTE:** In order to bring suit in federal district court under the American with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.

\_\_\_\_ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, et seq., for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

**NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

\_\_\_\_ Other (Describe)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**PARTIES**

2. Plaintiff's name: Latausha DE Boise

Plaintiff's address: 6244 Julian Ave  
Street address or P.O. Box

St. Louis MO 63133  
City/ County/ State/Zip Code

(314) 277-1919  
Area code and telephone number

3. Defendant's name: Special School District

Defendant's address: 12110 Clayton Rd  
Street address or P.O. Box

St. Louis MO 63131  
City/County/State/ Zip Code

(314) 989-8100  
Area code and telephone number

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.**

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

\_\_\_\_\_  
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

2008/2009 school year + 2009/2010 school year

**ADMINISTRATIVE PROCEDURES**

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: 3/09  
☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: 03/09  
☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes ☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☐ 60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☐ termination of my employment

☒ failure to promote me

☐ failure to accommodate my disability

☐ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☐ harassment

☐ other conduct (specify): \_\_\_\_\_

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Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

- ☒ race  
☐ religion  
☐ national origin  
☐ color  
☐ gender  
☐ disability  
☐ age (my birth date is: \_\_\_\_\_)  
☐ other: \_\_\_\_\_

Did you state the same reason(s) in your charge of discrimination?

☒ Yes ☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

March 7, 2008

Due to family crisis I was asked by Asst. Superintendent Don Bohannon to write a letter changing position with the company to a lower position (teacher asst), until the Dept of Education renewed my TAC (temporary authorization certificate). I was told that I would be hired back as a teacher once



my TAC was renewed. DESE issued my TAC renewal and SSD requested me enroll in Praxis Exam and complete 9 hours of college course work. Between March 2003 - July 2008 I completed what was requested. I waited until my paperwork was processed and applied for teaching position. SSD gave me the run around for a couple of weeks then had my supervisor inform me that they are no longer accepting <sup>the</sup> TAC. I later found out that they hired a white teacher for that position. Prior to being demoted to T.A. I taught at St. Louis Public Schools from 1998 - 2005 then I was hired at SSD in 2005. When I changed from teacher to T.A. my class was given to a white teacher, once I complete what was asked of me by SSD I was not promoted and a white teacher was hired.

January 2009 I was asked by supervisor to work as a substitute teacher at an elementary school. February 19, 2009 I was replaced by the white teachers assistant who only had

(Attach additional sheets as necessary).

a substitute certification. My certification is based upon education credit hours & working as a teacher until I'm fully licensed. A substitute certification is just 60 college credit hours in anything. I was told by my supervisor that the elementary teacher assistant substitute certification was the same as my TAC.

March 2009 I filed discrimination charge. As I substituted throughout the district it allowed me to see that the blacks were kept as teacher's assistant and majority of whites were teachers. There is a substantial difference in the number of promotions and demotions of blacks compared to promotions and demotions of whites with less or equal qualifications.

2009/2001 school year I attended 2 colleges. SSD was given a letter stating that I would be a certified licensed teacher for the school year. I was told I would need to wait until everything was processed.

(Attach additional sheets as necessary).

Meanwhile another teaching position opened in Jennings. This position was given to a white teacher with no teaching experience. Throughout 2009/2010 school year I worked in a hostile work environment SSD would not allow me to substitute teach. I was kept as a T.A. and at this point all of my paper work was complete and I was fully licensed. I was even offered a teaching position then told a few days later that it was going to someone else. I later found out she was white as well. When I asked HR why hadn't I been interviewed for the available positions in Jennings I was told various excuses. Working as a substitute allows an individual to earn more money. I was retaliated against & kept from doing what I love to do teach because I refuse to sit quietly and watch whites work in a position that I'm just as qualified.

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

\_\_\_\_\_ are still being committed by the defendant.

\_\_\_\_\_ are no longer being committed by the defendant.

☒ \_\_\_\_\_ may still be being committed by the defendant.

**REQUEST FOR RELIEF**

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes.

I would like to be compensated for actual  
damages, compensatory damages and punitive damages  
once all the facts are heard in a  
court of law.

Signed this 12 day of January, 20 11.

Sathya DeBose  
Signature of Plaintiff



JEREMIAH W. (JAY) NIXON  
GOVERNOR

MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS  
MISSOURI COMMISSION ON HUMAN RIGHTS

LAWRENCE G. REBMAN  
DEPARTMENT DIRECTOR

ALVIN CARTER  
COMMISSION CHAIRPERSON



ALISA WARREN  
EXECUTIVE DIRECTOR

October 15, 2010

Latausha DeBoise  
6244 Julian Avenue  
Saint Louis, MO 63133

NOTICE OF RIGHT TO SUE

RE: Latausha DeBoise vs. SPECIAL SCHOOL DISTRICT  
E-03/09-34783 28E-2009-00819C

Based on the investigation, the Executive Director was unable to conclude that the information obtained established violations of the Missouri Human Rights Act. Therefore, the Missouri Commission on Human Rights (MCHR) is terminating its proceedings and issuing this notice of your right to sue the respondent(s) named in your complaint.

This letter indicates your right to bring a civil action within 90 days of this notice against the respondent(s) named in the complaint. Such an action may be brought in any circuit court in any county in which the unlawful discriminatory practice is alleged to have occurred but it must be brought no later than two years after the alleged cause occurred or its reasonable discovery. Upon issuance of this notice, the MCHR is terminating all proceedings relating to the complaint. No person may file or reinstate a complaint with the MCHR after the issuance of a notice of right to sue relating to the same practice or act. You are hereby notified of your right to sue the Respondent(s) named in your complaint in state circuit court. **THIS MUST BE DONE WITHIN 90 DAYS OF THE DATE OF THIS NOTICE OR YOUR RIGHT TO SUE IS LOST.**

You are also notified that the Executive Director is hereby administratively closing this case and terminating all MCHR proceedings relating to it. This notice of right to sue has no effect on the suit-filing period for any federal claims.

Respectfully,

Alisa Warren  
Executive Director

SPECIAL SCHOOL DISTRICT  
12110 Clayton Road,  
Saint Louis, MO 63131

Charles B. Jellinek  
BRYAN CAVE LLP  
211 N Broadway, Suite 3600  
Saint Louis, MO 63102



3315 W. TRUMAN BLVD.  
P.O. Box 1129  
JEFFERSON CITY, MO 65102-1129  
PHONE: 573-751-3325  
FAX: 573-751-2905



111 N. 7TH STREET, SUITE 903  
ST. LOUIS, MO 63101-2100  
PHONE: 314-340-7590  
FAX: 314-340-7238



P.O. Box 1300  
OZARK, MO 65721-1300  
FAX: 417-485-6024



1410 GENESSEE STREET  
KANSAS CITY, MO 64102-1047  
FAX: 816-889-3582



106 ARTHUR STREET  
SUITE D  
SIKESTON, MO 63801-5454  
FAX: 573-472-5321